

SERCARZ & RIOPELLE, LLP

950 THIRD AVENUE, 31st FLOOR
NEW YORK, NEW YORK 10022
(212) 586-4900
FACSIMILE (212) 586-1234
www.sercarzandriopelle.com

ROLAND G. RIOPELLE
MAURICE H. SERCARZ*

* ADMITTED IN NY & NJ

MEMO ENDORSED

June 1, 2023

BY ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

The application for permission to travel is granted.
SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 6/2/2023

New York, New York

Re: *United States v. Markin, et al, 22 CR 395*
Seth Markin - Defendant

Your Honor:

I write to request that the defendant's travel restrictions be modified to permit him to attend a Tattoo Arts Convention, together with friends, in Portland, Maine from June 14 through June 20, 2023; and in Denver, Colorado from July 19 through July 27, 2023.

The defendant has previously been granted permission to attend Tattoo Arts Conventions with the same group of individuals. These two trips, however, will require the defendant to travel by plane. It is my understanding that Pretrial Services has no objection to the defendant taking either of these trips.

Background

On July 21, 2022, the defendant was named in the instant Indictment. The Indictment charges him with Conspiracy and substantive counts of Securities Fraud and Tender Offer Fraud based upon allegations that he misappropriated material non-public information relating to plans by Merck & Company, a publicly traded pharmaceutical company, to acquire Pandion Therapeutics, a publicly traded biotechnology company; and, that the defendant purchased Pandion stock and encouraged others to do so based upon this information.

On or about July 25, 2022, the defendant was arraigned to the instant Indictment. He was released on an unsecured bond of \$200,000, co-signed by the defendant's parents. The

defendant's travel is limited to the Southern District of New York, the Eastern District of New York, the District of New Jersey, and the Eastern District of Pennsylvania, where the defendant resides with his parents.

In or about September of 2022, the Court approved the defendant's prior request to attend a Tattoo Arts convention in Asheville, North Carolina from November 1 through November 8, 2022. Mr. Markin participated in that convention without incident. The defendant, likewise, was granted permission to attend the Tattoo Arts Convention in Baltimore, Maryland from April 20 through April 24, 2023.

I have spoken to Janitza Gomez, the Pretrial Services Officer tasked with monitoring the defendant's compliance with his bail conditions. She informs me that he has been fully compliant with the terms of his bail; and, that she will have no objection to the request that follows.

The Instant Request

The defendant requests permission to attend the Tattoo Arts conventions in (1) Portland, Maine from June 14 through June 20, 2023; and (2) Denver, Colorado from July 19 through July 27, 2023.

Prior to the defendant's departure, an itinerary of each of the defendant's trips, including flight and hotel information, will be provided to Pretrial Services.

Conclusion

For all the reasons set forth herein, we respectfully request that the defendant be permitted to make the trips described above.

Most respectfully,

/s/ Maurice H. Sercarz

cc: All Parties (by ECF)

USPSC Janitza Gomez (by email)